

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

CYWEE GROUP LTD.,

Plaintiff

v.

SAMSUNG ELECTRONICS CO. LTD.
AND SAMSUNG ELECTRONICS
AMERICA, INC.,

Defendants.

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NO. 2:17-CV-00140-RWS-RSP

**DECLARATION OF ELIZABETH L. BRANN IN SUPPORT OF DEFENDANTS'
RESPONSIVE CLAIM CONSTRUCTION BRIEF**

I, Elizabeth L. Brann, hereby declare as follows:

1. I am an attorney at the law firm Paul Hastings LLP, counsel of record for Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. in this action. I have personal knowledge of the facts herein and, if called as a witness, I could and would testify competently as to their truth.
2. Attached hereto as Exhibit 1 is a true and correct copy of U.S. Patent No. 8,441,438.
3. Attached hereto as Exhibit 2 is a true and correct copy of U.S. Patent No. 8,552,978.
4. Attached hereto as Exhibit 3 is a true and correct copy of Plaintiff's Objections and Responses to Defendants' Second Set of Interrogatories, dated December 1, 2017.
5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the transcript of the March 7, 2018 deposition of Joseph J. LaViola, Jr., Ph.D.
6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the transcript of the July 22, 2015 Claim Construction Hearing in *CyWee Group, Ltd. v. Apple, Inc.*, No. 14-cv-01853-HSG (N.D. Cal.).

7. Attached hereto as Exhibit 6 is a true and correct copy of the definition of “pointing device” in *The New Oxford American Dictionary*, bearing the Bates range SAM_CYWEE00041279–81.

8. Attached hereto as Exhibit 7 is a true and correct copy of the definition of “pointing device” in *The American Heritage Dictionary of the English Language*, bearing the Bates range SAM_CYWEE00041270–72.

9. Attached hereto as Exhibit 8 is a true and correct copy of the Applicant’s Amendments, filed on April 17, 2013 in Application No. 13/176,771.

10. Attached hereto as Exhibit 9 is a true and correct copy of the Notice of Allowance, filed on June 25, 2013 in Application No. 13/176,771.

11. Attached hereto as Exhibit 10 is a true and correct copy of P. Groves, *Principles of GNSS, Inertial, and Multisensor Integrated Navigation Systems*, 19–22 (2008), bearing the Bates range SAM_CYWEE00041273–78.

12. Attached hereto as Exhibit 11 is a true and correct copy of A. Noureldin, et al., *Fundamentals of Inertial Navigation, Satellite-based Positioning and Their Integration*, 21–63 (2013).

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 9th day of March, 2018 in San Diego, California.

/s/ Elizabeth L. Brann
Elizabeth L. Brann